

Massachusetts Electric

A **National Grid** Company



Amy G. Rabinowitz
Counsel

January 9, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: D.T.E. 01-76

Dear Secretary Cottrell:

On behalf of Massachusetts Electric Company and Nantucket Electric Company (collectively "Company"), I am enclosing the Company's response to information request 1-25. Thank you very much for your time and attention to this matter.

Very truly yours,

Amy G. Rabinowitz

cc: Joseph Rogers, Office of the Attorney General

D.T.E. 1-25

Request:

Provide a narrative explaining the reasons for all changes to the Company's Interconnection Requirements Document for Customer-Owned Generating Facilities, M.D.T.E. 1000-A. Include in your response an explanation (and citations) how each section of M.D.T.E. 1000-A is consistent with a corresponding specific requirement of 220 C.M.R. §§ 8.00 et seq.

Response:

The significant differences between M.D.T.E. 1000 and M.D.T.E. 1000-A include the following:

- The primary purpose of M.D.T.E. 1000-A is to simplify the interconnection policy and requirements for customers with small generating facilities. The Company reorganized the document significantly for easier reading and comprehension.
- M.D.T.E. 1000-A includes an applicability section, showing the document's applicability to all interconnections to the Company's Distribution System, including those by Qualifying facilities and On-Site Generating Facilities, as defined in 220 CMR 8.02, with the exception of portable emergency generators (see Section 1 in 1000-A). This was not specifically articulated in M.D.T.E. 1000.
M.D.T.E. 1000-A outlines the process that will be followed to accommodate interconnections to the Company's Distribution System (see Section 3 in 1000-A). The process was not articulated in M.D.T.E. 1000. M.D.T.E. 1000-A organizes the technical requirements by size of interconnecting facility and the technology utilized by the facility (see Section 4 in M.D.T.E. 1000-A). This was done to make the requirements easier to understand for customers and was not done in M.D.T.E. 1000.
- Tables 1-A and 1-B were added to M.D.T.E. 1000-A. They provide a summary of the technical requirements, by technology, for all units under 1,000 kW (see Section 4 in M.D.T.E. 1000-A). This was done to make the requirements easier to understand for customers and was not included in 1000.
- Security requirements for potential tax liabilities were eliminated in M.D.T.E. 1000-A (see Sections 3.2.1 and 3.2.2 in M.D.T.E. 1000).

- Where applicable, changes were made to M.D.T.E. 1000 so that M.D.T.E. 1000-A fully conforms with 220 CMR 8.00 as currently in effect. In particular, the metering requirements were revised to conform to 220 CMR 8.04 (see Section 7.3 in M.D.T.E. 1000-A).
- M.D.T.E. 1000-A includes the list of information that an Interconnecting Customer must provide to the Company as part of its Notice of Intent (see Exhibit 1 in M.D.T.E. 1000-A). This list conforms with the requirements of 220 CMR 8.00. M.D.T.E. 1000 did not include the information requirements.
Minor edits were made to the Interconnection Service Agreement (see Exhibit 2 in M.D.T.E. 1000A).
M.D.T.E. 1000-A incorporates the Company's Policy and Practices for Protection Requirements (see Exhibit 3 in M.D.T.E. 1000A) to enable Interconnecting Customers to know the protection requirements. These requirements are organized by size and technology for ease of use. This policy was previously in a separate document that was not included in M.D.T.E. 1000.
- Minor edits were made to the Form of Distribution Facilities Impact Study Agreement and the Form of Distribution Facilities Detailed Study Agreement (see Exhibits 4 and 5 in M.D.T.E. 1000A).

The Interconnection Requirements Document, inclusive of the changes that the Company has proposed to make in response to these Information Requests, is consistent with 220 CMR 8.00 et seq. At all times, the Company intends to interpret and implement it consistent with 220 CMR 8.00 et seq., where applicable. More specifically:

Section 1: The Interconnection Requirements Document includes, but is not limited to, the types of facilities specified in 220 CMR 8.01(2), qualifying facilities and on-site generating facilities.

Section 2: The definitions are consistent with the definitions in 220 CMR 8.02.

Section 3: The process overview is consistent with the process set forth in 220 CMR 8.04 through 8.06.

Section 4: The basic understandings are consistent with 220 CMR 8.03 through 8.06.

Section 5: The construction of the Distribution Facilities Upgrades is consistent with 220 CMR 8.04.

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Section 6: The Distribution Facilities Upgrades charge is consistent with 220 CMR 8.04(7).

Section 7: The delivery and measurement of electricity section is consistent with 220 CMR 8.03 and 8.04.

Section 8: The notice provisions do not conflict with any part of 220 CMR 8.00 et seq.

Section 9: The access and control provisions are consistent with 220 CMR 8.04(5).

Section 10: This section does not conflict with any part of 220 CMR 8.00 et seq.

Prepared by or under the supervision of: M. J. Hager